

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	: CRIMINAL NO.
v.	: DATE FILED:
JAIME KAISNER	: VIOLATIONS: 18 U.S.C. § 656 (Embezzlement of bank funds by bank employee - 1 count) 18 U.S.C. § 982 (Criminal forfeiture)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to this Indictment:

1. Sovereign National Bank was a financial institution whose deposits were insured by the Federal Deposit Insurance Corporation.
2. Defendant Jaime Kaisner was a teller at the Boothwyn Branch of Sovereign Bank, Boothwyn, Pennsylvania.
3. From in or about May 2000, through in or about September 2000, in the Eastern District of Pennsylvania, defendant

JAIME KAISNER

being an employee, that is, a teller, of Sovereign Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation, knowingly embezzled, abstracted, purloined, and willfully misapplied approximately \$28,784 in funds and money intrusted to the custody and care

of Sovereign Bank.

In violation of Title 18, United States Code, Section 656.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As the result of the violation of Title 18, United States Code, Section 656, as charged in Count One, defendant

JAIME KAISNER

shall forfeit to the United States any and all property constituting, or derived from, proceeds obtained directly or indirectly, as the result of such violation, including, but not limited to the sum of \$28,784.

If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b), incorporating 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendant up to

the value of the above forfeitable property.

Pursuant to Title 18, United States Code, Section 982(a)(2).

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney